

EXHIBIT C

Sworn Declaration of [REDACTED]

1. My name is [REDACTED]. I am an employee at Maid-Rite Specialty Foods, where I have worked since 2015. On July 30, 2020, I submitted a sworn declaration in the case *Jane Does I, II, III et al. v. Scalia et al.*
2. I am writing this declaration to provide more information about what has happened at the Maid-Rite plant since the OSHA complaint I filed in April, including what happened after OSHA came to Maid-Rite to do an inspection in July. I also want to describe what things are like at Maid-Rite now, in the second week of August 2020 when I am signing this declaration.
3. When I heard that there were starting to be infections at my workplace, I thought Maid-Rite would space people out on the production line, slow it down, provide face masks and shields to ALL employees. But they did not. They deep cleaned the production area, the main hallway, the lunchroom and bathrooms after the initial employee infections. No other areas that were frequented were cleaned, including our maintenance shop. To my knowledge, according to management, they did the deep clean once with an outside agency.
4. I thought there would be staggered breaks and shifts, but none were put in place. Temperature checks were installed and still continue, but they are quite lax. Sometimes people are not at the temperature check station and people walk through because no one is there. Sundays when we come in there are no temperature checks.
5. I also expected to be made aware of when I was in close proximity to the people who were positive, but to date, I have still not been informed of any illness, even though I know I was in the room with people who were sent home for being positive. There are still positive cases and we don't know. It is left to the discretion of our employer and management does not and has not told us anything since April.
6. The company made a few changes based on the recommendations but didn't follow through to make these changes effective. As stated above, the temperature checks are not performed carefully. There are a couple of hand sanitizing stations, but they are not always full of hand sanitizer, and they are not in all locations of the facility. They added partitions to the cafeteria tables, but not anywhere else in the plant. Therefore, I reached out to OSHA because historically they have provided protection and forced companies to uphold standards for a safe workplace. A few days after I filed the complaint I got a call saying OSHA was not going to come to the plant to inspect.
7. After you reach out to your employer and they do nothing, you expect OSHA to do something. When they do nothing, where else do you go?
8. OSHA came to Maid-Rite to inspect in July. As I explained in my previous declaration, my supervisor told us a week before the inspection that OSHA was coming at some point. On the day of the inspection, I was told at 6 a.m. that OSHA was due to visit that day and

to make sure I do everything "right." When OSHA arrived, we were informed by my supervisor that OSHA was there and he stressed again to do everything right. Ten minutes later he came back in and said they walked through in ten minutes and they didn't even stop to look at anything. He made a big joke about it like it was funny.

9. Nothing has changed since OSHA came out to inspect. I still have only been provided paper masks to wear two times, total. Managers and many production workers are not wearing masks on their faces; they wear them around their necks. When I have pointed this out to management they have done nothing.
10. In the pack room, the raw side, grinding areas and forming areas the production crew are still elbow-to-elbow, right next to one another and across from one another. There are no markings on the floor or dividers to show people how far to stand apart.
11. No additional handwashing stations have been installed since OSHA's visit. There are three stations for hand sanitizing in the main hall of the cooked side of the plant for the 60 to 80 people that go through there to their stations.
12. While Maid-Rite has focused on keeping the production lines clean because of USDA inspections, they have not kept other parts of the plant that we need to use clean. For example, those hand sanitizing stations haven't been cleaned.
13. The bathrooms don't appear to be cleaned either, just swept, but I don't know for sure. They fill supplies, but I have been looking at a big chunk of meat (the size of a dime) that has been there for at least a month on the wall. I see it when I go in there. On the cooked side, there is only two sinks, two urinals, and one stall for 60 to 80 men to use. I prefer going outside in the woods when possible or necessary due to the condition of the bathroom and overcrowding.
14. OSHA is supposed to protect workers by law. Their failure to protect us, to come out to visit unexpectedly and to hold the company accountable has made us all fearful and helpless. Especially as an essential worker, you have no choice. You can either work in the unsafe environment or not be able to take care of your family.
15. OSHA not only let me down as far as ensuring a safe workplace, but I also know that if nothing is done, the company will likely find a reason to terminate me for speaking out on behalf of myself and my fellow workers.

I, [REDACTED], declare under penalty of perjury that this declaration is true and correct to the best of my knowledge and understanding.

Signature

08/13/2020

Date